



December 30, 2005

Mike Johanns
United States Secretary of Agriculture
Farm Bill
1400 Independence Avenue, SW
Washington, DC 20250-3355

Dear Secretary Johanns:

The Society of American Foresters (SAF) representing over 15,000 forest managers, researchers, and educators across the country in a variety of employment sectors, would like to express our thanks for your continued efforts to seek public advice on the implementation of the 2002 Farm Bill and the development of new ideas for the 2007 Farm Bill. We offer the following comments and suggestions in response to your request in the *Federal Register* notice dated June 17, 2005.

Forestlands along with crop and grazing lands are critical to conserving natural resources and maintaining working rural landscapes—goals which USDA is committed to achieving particularly in the context of the President's Cooperative Conservation Initiative.

The 2007 farm bill offers an opportunity to provide enhanced assistance to private landowners and improve upon the values and services these lands provide to society by taking a comprehensive, landscape approach to the conservation of natural resources, including both forestlands and crop and grazing lands. This comprehensive approach is essential as society demands more clean water, wildlife habitat, recreational opportunities, and other values and ecological services derived from an inter-mixed and interdependent landscape of forests and farms that are largely privately owned. Further, a recent landowner survey found that a significant amount of forestland, over 100 million acres, is described as being on a farm, thus demonstrating the integration of forestland with crop and grazing lands.

While forestland owners do have unique challenges, such as forest health and wildfire threats, they are also affected by many of the same challenges faced by the nation's more than 2 million farmers. With over 10 million family and individual owners of private forests, these challenges continue to multiply. Private forestland owners face unprecedented development pressures, a globalizing forest products market that is difficult to compete in given factors that impose higher costs on the forest products industry, an aging ownership demographic and uncertainty about the management objectives of their heirs, shrinking forest tract size that is much more difficult to manage than the larger tracts of a few years ago, and many other challenges that make owning and managing forests difficult as a long term stewardship commitment.

SAF believes that if owning forestland is not economical, or if the ecological and social issues and needs are not attended to, it will be extremely difficult to ensure that forests can provide the many benefits and values that society requires over the long-term. SAF strongly supports federal assistance for private forest owners to help them address issues that hinder the sustainable conservation and management of forests. With over two-thirds of the nation's forests in private ownership and 42 percent of forests owned by families and individuals, long-term sustainable management of privately owned forests remains a significant challenge.

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With these challenges and opportunities in mind, we offer the following responses to the questions posed in the request for comments that fall within our area of expertise with the goal of helping to move these ideas forward in the 2007 Farm Bill and beyond.

How should Farm policy be designed to maximize the US competitiveness and our country's ability to compete effectively in global markets?

While this question is primarily inquiring about traditional agriculture products, it is important to also consider the competitiveness of private forest owners and the US forest products industry in the context of U.S. farm policy. The forest products industry faces significant challenges as overseas competition and domestic policy issues make it extremely difficult to thrive in today's market. The US must maintain a viable forest products industry that will utilize materials from US forestlands, produce goods and services, and help forestland owners maintain revenue streams to retain and manage their forests. Development is often the only alternative if these family forest owners do not have the economic means to retain and manage their forests. Additionally, lack of management and markets for the by-products of management can affect the health and resiliency of forests, leading to increased risk of wildfires, insect and disease outbreaks, and influx of invasive species. Maintaining a viable forest industry can also provide millions of jobs and contribute significantly to the U.S. economy.

While the main factor affecting US forest products industry competitiveness is unfavorable US tax policy, we believe there are steps that can be taken in addition to changes in tax policy that can help to address this critical issue. To help address competitiveness, farm bill programs should:

- Focus on maintaining private forests as a sustainable element of the working landscape.
- Focus on sustainable forest use and management by addressing environmental, economic, and social issues and opportunities.
- Encourage innovative new products and markets for wood fiber-based raw materials.
- Provide compensation to forestland owners for conservation practices that provide off-site benefits and perform ecological services

How can farm policy best achieve conservation and environmental goals?

Integration and Landscape Scale Implementation. Forestlands, in combination with crop and grazing lands, are essential to maintaining the working, rural landscape and to the conservation of natural resources. The 2007 farm bill can help meet conservation and environmental goals by acknowledging the diverse and inter-mixed landscape of both forests and farms which we must conserve and maintain and include in program delivery. Provision of clean water, wildlife habitat, recreation, aesthetics, and other public benefits is reliant on the entire landscape, not just one component of the landscape or a single ownership. Today's Farm Bill conservation programs, both in the forestry title and in the conservation title, do very little to recognize this fact or to work across the inter-mixed landscape. Currently, programs are implemented in a piecemeal fashion with no integration or connection with other programs or activities with similar objectives. We urge better integration and implementation of conservation programs across the landscape and across ownerships and land classifications to ensure the conservation and environmental benefits of these programs can be most effectively realized.

Prioritization and Targeting. Dollars for conservation and environmental objectives should be prioritized to ensure resources are addressing the most important needs on the landscape. We strongly support a locally led state-specific and/or regional prioritization process, involving multiple stakeholders and landowners. This process should involve the appropriate federal and state agencies and landowner organizations, integrating the work of multiple disciplines including forestry, wildlife, watershed, and agricultural agencies.

Once priorities are determined, program resources should be targeted to effectively meet these priorities. The trend in program implementation, moving away from first-come-first-serve programs and moving towards targeting program objectives and resources to achieve the greatest benefit to society, should continue. The needs of the landowners and the issues they face, as well as the societal benefits should be considered when implementing these programs and allocating resources.

Variety of Tools and Options. Finally, to best meet these objectives, programs should provide a variety of options and tools for private landowners, including both forestland owners and agricultural producers with forestland. SAF strongly supports educational, technical, and financial assistance as well as conservation reserve and easement programs. A variety of options and tools are critical to meeting the unique needs of individual landowners while also working to achieve conservation goals across the landscape.

Of particular importance is the provision of professional advice to forest landowners. Surveys have shown that very few forest owners seek professional advice before making decisions about their land, which can negatively impact the both the landowner's economic opportunity and the ecological health of their forests.

It is important to note that funding for these tools and options should be derived from a variety of sources including federal, state, local, and private sources. We urge consideration of programs that leverage private dollars for the provision of public benefits and we look forward to exploring options such as carbon sequestration, threatened and endangered species mitigation banking, and other possibilities that can help landowners continue to provide natural resource services and goods to the nation.

How can Federal rural and farm programs provide effective assistance in rural areas?

Maintaining and conserving working rural landscapes comprised of farms and forests, is the first step in ensuring that rural economies and rural way of life are sustained. A strong connection exists between the economy, the environment, and the social framework and if one aspect is disregarded or neglected, it will be difficult to sustain the rural way of life. When considering assistance to rural areas, we urge you to focus on programs that integrate the three interconnected aspects of sustainability.

How should agricultural product, marketing, and research-related issues be addressed in the next farm bill?

Investment in research is critical to sustaining the rural landscape while continuing to provide and improve upon the values and benefits that society demands. An integrated approach to research across natural resource disciplines is increasingly important as the issues of today are not limited to just one discipline. Research is critical to providing the latest technologies and adding value to forest products, which in turn help to sustain the economy and address forest health and other management issues. Today's challenges affecting natural resources, such as development pressures; environmental threats like insects, diseases, wildfires, and invasive species; aging landowner demographics are occurring at the same time that the increasing population is demanding more goods and services. Research into new products and markets, new management techniques, and social and policy frameworks will help forestry professionals continue to manage forests to benefit the environment, contribute to the economy, and meet societal demands.

Forestry research capacity in the USDA Forest Service continues to decline, as experienced scientists retire and few are hired to take their place. To address this issue and help to ensure the US continues to be a leader in forestry research, we urge increased cooperation and partnership among the USDA research entities and the universities and colleges who help to train the next generation of researchers while

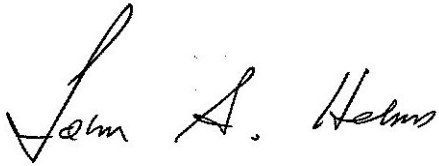
leveraging private and other public resources to help accomplish the work. Also important to research is technology transfer through extension and application of research to real world situations. This is critical if we wish to realize the benefits of investment in research. The Farm bill should address the need for extension and transfer of research, given the growing number of family forest owners and the growing number of challenges they face.

Research and work to expand products and markets for agricultural products should address not only agricultural products but also forest products. A comprehensive approach will serve to maintain and enhance the conservation and sustainable management of the working rural landscape.

In closing, we wish to express our appreciation for the opportunity to comment on the development of ideas for the 2007 farm bill. We believe that it is critical that the farm bill, and other policies and programs designed to conserve the nation's natural resources, focus on the landscape, across ownerships and land classifications. As we continue to face difficult financial circumstances for funding of worthwhile programs, it is critical that federal resources be used in the most effective manner. We believe the approaches outlined above will help to achieve this goal, while at the same time helping to ensure the natural resources and rural social fabric of the nation continue to thrive.

Thank you for your consideration of these recommendations.

Sincerely,

A handwritten signature in black ink, reading "John A. Helms". The signature is written in a cursive, flowing style. The first name "John" is written with a large, stylized "J" that loops around the "h". The middle initial "A." is written with a large "A" and a period. The last name "Helms" is written with a large "H" and a stylized "l".

John A. Helms
President